

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LINDA J. BRUMFIELD,)	08 C 2024
Plaintiff,)	
)	Judge Leinenweber
v.)	
)	Magistrate Judge Cox
CITY OF CHICAGO,)	
)	
Defendant.)	

**DEFENDANT’S UNOPPOSED MOTION FOR A BRIEF EXTENSION OF TIME TO
FILE REPLY IN SUPPORT OF THE CITY’S MOTION TO DISMISS**

Defendant City of Chicago (the “City”), by Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully requests that this Court grant it a brief extension of time of three (3) days, up to and including August 8, 2008, in which to file its Reply in further support of its Motion to Dismiss Plaintiff’s Complaint. In support of this motion, the City states as follows:

1. On April 9, 2008, plaintiff filed a complaint against the City pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.*, 42 U.S.C. §§ 1981 and 1983, and Illinois law, alleging discrimination and retaliation claims on the basis of race, gender and sexual orientation. On July 9, 2008, the City filed a motion to dismiss plaintiff’s complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

2. On July 15, 2008, this Court set a briefing schedule for the City’s motion to dismiss. Plaintiff’s response brief was due on July 29, 2008 and the City’s reply is due on August 5, 2008. The Court set a tentative ruling date on the motion for September 4, 2008 at 9:00 a.m.

3. Due to the press of other matters, and not for purposes of delay, undersigned counsel request an additional three (3) days, up to and including, August 8, 2008, to file the City’s reply brief. Specifically, Ms. Sánchez, one of the two attorneys representing the City in this matter, was preparing final pre-trial order materials for and was scheduled to begin trial on August 4, 2008 in Sebastian v. City of Chicago, et al., Case No. 05 C 2077, before Judge Kendall in the United States District Court for the Northern District of Illinois. That case settled on July 31, 2008. In addition,

Mr. Rutherford, the other attorney representing the City, has been preparing for numerous depositions and has been engaged in extensive motion practice in other cases.

4. The purpose of this motion is not for delay, but to allow the City's counsel adequate time to reply to plaintiff's response in light of their other professional responsibilities. The brief extension of time requested herein will not unduly delay these proceedings.

5. Plaintiff's counsel does not oppose this motion.

WHEREFORE, the City respectfully requests that this Court grant it an additional three (3) days, up to and including August 8, 2008, in which to file its Reply in further support of its Motion to Dismiss Plaintiff's Complaint.

Dated: August 4, 2008

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel for the City of Chicago

By: /s/ Marcela D. Sánchez
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